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ABSTRACT

A discussion of the history and current role of accrediting agencies in higher education in the United States is presented in this paper with an overview of the role of the Council of Postsecondary Accreditation (COPA). First, a brief history of the accreditation process during the past 70 years is presented; the roles of institutional and specialized accreditation are outlined; the goals of postsecondary accreditation are specified; and the 1975 establishment of COPA and its subsequent role are delineated. The following sections then discuss current problems in the accreditation process and the ways these could be addressed by the accrediting agencies, by COPA, and by the institutions themselves. First, the role of the agencies is addressed, focusing on their responsibility for setting standards, seeing that concerns about the quality and adequacy of professional education are addressed, monitoring accreditation costs, and cooperating with other agencies. The next section discusses the way COPA is addressing concerns in accreditation by providing a national forum for accreditation, encouraging cooperation among agencies, and dissuading federal and state agencies from developing new statutory requirements for eligibility for funds or licensure. Finally, the role of the institutions is considered, which includes providing assurance of the quality of instruction, programs, and governance; and developing self-study and review schedules as an integral part of self-assessment. (HB)

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Saluting, But Not Speaking

Daniel Boorstin, in his great trilogy on The Americans, uses the phrase "self-liquidating ideal" to define a problem he considers peculiarly American. A self-liquidating ideal is one that provides a solution to a problem, bringing with it values we want and believe in, but in the process brings with it frustration with other problems the solution creates. For example, we set aside huge areas in national parks to preserve the wilderness for people to enjoy. Now hundreds of thousands trek to the parks to enjoy them, and the democratized wilderness becomes a shambles. We are then infuriated. Boorstin's point is that we can't tolerate this ambiguity. A problem resolved--an ideal realized--shouldn't create other problems.

In the same vein, Robert Penn Warren has affirmed that "the greatest curse of American society has been the idea of the easy millennialism---that some new drug, or the next election, or the latest in social engineering--will solve everything". "This belief in easy solutions", he says, "has given us the power of optimism, but I also think it is the biggest damned foolishness in history. When solutions don't work, we are outraged, we become cynical, despairing, violent. There are no easy solutions, no automatic redemptions."

Whether or not this is peculiarly American, I do see the relevance of what Boorstin and Warren are saying to a uniquely American phenomenon which has played a significant role in education--voluntary self-regulation and peer-evaluation. Unlike other countries which have centralized authority exercising national control over educational institutions, the principle of political freedom led in America, as Howard Bowen has indicated, to the affirmation that "the institutions of education and communications--the institutions that shape the minds of the people--stand apart from government". American institutions of higher education have enjoyed a remarkable independence and autonomy; and pluralism, diversity, and heterogeneity have been clear results of that freedom. But how to use that freedom responsibly has always been the critical issue. The practice of accreditation arose as one important answer to that issue--institutions accepting not only the right to regulate themselves, but the obligations and responsibilities that a system of self-regulation requires. A great ideal, integral to the nature and character of American higher education---how dare its realization bring ambiguities and problems!

I

If we accept the real beginnings of this ideal of self-regulation as evident in the major efforts of those in the medical field to establish and monitor standards of quality, then the accreditation process is just over 75 years old. By 1957, 21 specialized agencies were recognized by the National Commission on Accrediting. In 1965 that number had grown to 25. In 1983 there are 37 specialized associations recognized by COPA. One of these is CAHEA, which represents 42 collaborating organizations in allied health areas sponsoring a single accrediting mechanism.

Institutional accreditation, beginning with the North Central Association in 1913, now includes nine regional Commissions, and four national associations accrediting independent business schools, Bible colleges, correspondence schools and trade and technical schools.

An institutional accrediting body considers the characteristics of institutions as a whole. Thus it gives attention not only to the educational program of the institution it accredits, but also to such institutional characteristics as student personnel services, financial conditions, and administrative strength. The criteria of an institutional accrediting body are broad and qualitative, as is demanded by the attention to an entire institution and by the presence in the United States of postsecondary institutions of widely different purposes and scopes. Such broad criteria also provide encouragement to institutions to try innovative curricula and procedures, and to adopt them when they prove successful.

Specialized agencies primarily accredit programs or schools in complex institutions that prepare professionals, technicians, or members of special occupations, for example, business, law, engineering, etc. Most of these agencies require that the programs or schools they evaluate must be part of an institutionally accredited entity. The intimate relationship of the specialized agencies to their professional associations provides an assurance that their accreditation requirements are educationally sound and are also related to the current requirements for professional or occupational practice. They play a significant role in defining the profession or occupation, in re-examining the educational requirements essential to meet professional objectives now and in the foreseeable future, and in protecting the public from being served by inadequately trained individuals. In a number of fields, graduation from an accredited program in the field is usually a requirement for receiving a license in the field. Consequently, although not often mentioned or considered by some critics, more specific requirements are often mandated, particularly for certain resources, in order to provide a program adequate for the preparation of the professional.

Institutional and specialized accreditation complement one another. The focus of an institutional accrediting body on an institution as a whole provides assurance that the general characteristics of the institution have been examined and found to be satisfactory. The focus of a specialized accrediting body on a specific program provides assurance that the details of that particular program meet the external accreditation standards.

Historically and currently, accreditation at the postsecondary level has the following goals:

- . To foster excellence in postsecondary education through the development of criteria and guidelines for assessing educational effectiveness.
- . To encourage improvement through continuous self-study and planning.
- . To assure the educational community, the general public, and other agencies and organizations that an institution or program has clearly defined and appropriate objectives, maintains conditions under which their achievements can reasonably be expected, appears in fact to be accomplishing them substantially, and can be expected to continue to do so.
- . To provide counsel and assistance to established and developing institutions; and

- . To endeavor to protect institutions against encroachments which might jeopardize their educational effectiveness and academic freedom.

The implications of self-regulation led in 1949 to the formation of organizations of accrediting agencies: the National Commission on Accrediting for specialized agencies and the National Committee on Regional Accrediting Agencies (to become later the Federation of Regional Accrediting Commissions on Higher Education), for agencies evaluating institutions as a whole, both organizations accepting the responsibility for setting and maintaining higher standards for the self-regulatory agencies themselves. In 1975, these organizations merged to form the Council on Postsecondary Accreditation and, in doing so, accepted the obligation of undergoing periodic reviews of their accrediting activities in terms of criteria in several areas -- organizational structure and scope, public responsibility, evaluative practices and procedures, educational philosophy and related procedures, and cooperation and coordination. A major task of this Council is to screen accrediting agencies which seek recognition status. Such review and recognition "acknowledge accreditation's broad public responsibilities as well as the specific interests of the many groups affected by accreditation".

The Council began its work at a time when two significant changes in higher education were making themselves felt. One of these was a marked increase in the number of program specialties emerging and seeking recognized accredited status. As I have already indicated, there were 25 recognized specialized agencies in 1965, and 37 in 1982, a 48% increase in 17 years. But the increase in number of programs accredited was from 29 in 1965 to 67 in 1982, a 131% increase. Four of those had been in existence for many years, but were in two-year colleges and therefore ineligible for recognition by the National Commission on Accrediting which recognized only baccalaureate programs. If we include these, the increase was from 33 to 67 in seventeen years, slightly over 100%. But the great surge of growth has been within the past 6-8 years. And, it is worthy of note, 30 of the 34 programs were in areas of allied health, 18 of these under the umbrella of CAHEA. What can we make of this? Is this proliferation? Certainly it is, if "proliferation" means "rapid growth". But "proliferation" tends to be identified with problems rapid growth often occasions, and to be thought of as "uncontrolled or ill-advised or downright bad growth". Is the increase in program proliferation in this sense? Only a madman would say "Yes". Does any one seriously want to turn back the clock, deny that we need or want rigorously trained and educated paramedics, surgical technologists, diagnostic medical sonographers, cardiovascular perfusionists? The growth here represents advances in knowledge and skills to save human lives. The problem we face then is not that of unwanted growth. It is this--how we cope with the desirable growth in these areas, the corresponding need for educated and trained individuals, and the demands these needs now impose on our institutions of higher education.

And that reminds us of the other significant change that was fast developing at COPA's beginning. Pressures on institutions, programs, and consequently accreditation were beginning to mount, and those pressures have intensified. In a period of fiscal retrenchment, demands imposed on states by Propositions ranging from 2½ to 13, continuing inflation, and declining student enrollments and financial aid, institutions face and often succumb to the temptation to compete for and retain students at all costs. Peculiarly vulnerable to "worst case examples" and horror stories, institutions find themselves in an atmosphere unlike anything they have experienced in their history -- a decline in public

confidence, a waning of belief in institutional integrity, and increasing doubts about institutional quality. Pogo's wry humor may be appropriate here: "We are (indeed) surrounded by insurmountable opportunities".

It is in this context that your concerns about accreditation have to be understood and addressed. There have always been critics of the process. Like all social processes, the record of voluntary peer-evaluation has been uneven, revealing responses not only to internal desires to do the ablest job possible but to external pressures for stricter accountability. Critics of the process have charged that specialized associations care only about their professions and not the institutions where their programs are carried on, that they abuse the freedom they have been given to restrict competition in their own fields and place inordinate demands on institutions for their specialty's resources. Institutional accreditation has been styled as a self-protecting, self-serving "buddy system", an archaic survival of the "good old boy" tradition, which is considered by the academic world to be self-justifying and sacrosanct. One can find support for such charges in the past and present record, and still recognize that the system which the institutions and the professions have devised to protect quality has to a large degree worked inordinately well to achieve that objective. But it is the present climate that exacerbates every concern, whether that concern is real or imagined. And it is this climate that raises a far more significant issue--whether the academic community will continue to be able to preserve its self-regulatory communal responsibility for quality control and enhancement, or whether that responsibility will be abdicated because we cannot tolerate the ambiguities and problems of an ideal we once believed in, and delegated to others already eagerly waiting in the wings. We all need to remind ourselves of what Nyquist has called "Sanders First Law of Bureaucratic Meddling": "The zeal of governmental bureaucrats to regulate higher education varies inversely with the academic community's ability to deal with its own problems".

It is, I think, unnecessary for me to repeat the problems that have occasioned the growing concern about the relationship of specialized to institutional accrediting associations, to other specialized associations, and to institutions themselves -- duplication, complexity of requirements, the financial burden, infringement on institutional rights, and what-have-you. Let me rather suggest where and how these problems are or can be addressed by the agencies, by the Council on Postsecondary Accreditation, and by the institutions themselves.

II

First, the agencies. For all accrediting agencies, institutional or specialized, the assessment of the quality of education is the essential purpose, deriving from this the right of the agency to set standards that are reasonable and appropriate to achieve that purpose. No, one, I believe, would doubt that right; differences of interpretation about what is truly reasonable and appropriate, however, create constant tension. But we need to be reminded that this tension is not just between agencies and institutions -- it is there within the agency itself among its own commissions and staff personnel as well as they constantly wrestle with the question of what really is not only reasonable but appropriate.

The tensions there are creative, or can be. Divisions of opinion are common. Specialized agencies are no more the monolithic and single-minded entities we assume them to be than are institutional agencies, educational institutions, or

other organizations of human beings. There is ferment going on in all specialized agencies, as in institutional agencies, about standards, procedures, and policies, some of it admittedly the result of external pressures, but also the result of internal questioning about the relevance and reliability of these in enabling the agency to achieve its objectives. Witness the recent major changes in the standards and procedures of the American Assembly of Collegiate Schools of Business, the National Council for the Accreditation of Teacher Education, and the National League for Nursing. Witness the efforts within CAHEA to maintain constant vigil over possible infringement on institutional rights, to ensure that policies and procedures are not **only** defensible but significantly related to the quality of programs.

Whatever the motivation, specialized agencies must, along with their right to set reasonable and appropriate standards, accept the corresponding obligations to the institutions whose programs they accredit.

One of these is to provide guidance and support for the continued improvement of the programs, consultation services available from professional staff and others with particular expertise, publications useful for curriculum development, and research carried on nationally for the benefit of all institutions.

A second obligation is to maintain constant vigil to see that legitimate concerns with quality and adequacy of professional education are not translated into illegitimate requirements that undermine the authority of the institution to carry out its responsibilities. That task is not easy. It is not easy for a department in an institution seriously concerned about better education for its students to remember that it is a part of a whole, and that its **expectations** and needs must be assessed in view of the whole. But specialized agencies certainly should not be guilty of supporting or encouraging special interest group demands for resources or prerogatives that overstep the bounds of their legitimate ideal, neglect institution-wide interests and concerns, and reveal no regard for the meaning of a unified institution. Dr. Francis Horvath has said it all very well in her paper on "Rights and Responsibilities of Institutional Sponsors and Accrediting Agencies". In seeking accreditation, an institution does not abdicate its right "to choose its own administration and faculty, to establish admissions requirements and select its own students, to formulate curricula, establish graduation requirements and determine the credentials to be awarded, to design facilities and apportion and arrange space, to select and contract with affiliates, and to charge fees and manage its budget". It agrees "to exercise its rights within the framework of a given set of reasonable standards to meet its responsibilities". But the agency in return accepts the obligation to keep the framework from becoming "too costly, too cumbersome, too complex", so that, instead of guiding and supporting, it "**begins** to interfere and obstruct". This requires constant vigil and unceasing self-examination, and, in its periodic review of agencies and its follow-up with them between reviews, **COPA** makes this a primary concern as well, and the examples of agency efforts in this direction to which I have already referred are matched by others in agencies recognized by COPA.

Agencies also have the obligation to **monitor the costs** of accreditation and help to contain those costs, consistent with the **purpose** of quality education to be achieved. The findings of the CAHEA survey of sponsoring institutions that the self-study is at once the most costly part of the accreditation process and the

one recognized as most beneficial to the institution and the program are not surprising. Experience with institutional and specialized agencies of all sorts suggests the same conclusion. The survey itself clearly reveals the concern of CAHEA that costs be restrained and not accepted as necessary and inevitable, however much the institution or program is benefitted by the self-study. And I might add that the action by CAHEA and other agencies to ensure that only those requirements clearly necessary for ensuring compliance with standards are stipulated, is a recognition of what responsible self-regulation is all about.

A further obligation to counteract the development of separate accrediting associations, for subspecialties in their fields, accrediting associations have an obligation, as in the case of teacher education and allied health, to bend every effort to include clusters of these within an encompassing organization.

Finally, specialized agencies have an obligation to cooperate with other accrediting agencies in resolving the problems of duplication of effort in preparing self-study reports and multiple visits, in developing common data bases and comparable standards. Under the leadership of COPA, the accrediting community has agreed that cooperation is a desirable goal and that sincere, continuing efforts toward cooperation are essential if accreditation's position as a positive force is to be enhanced in advancing quality education. In just the last few years examples of cooperative arrangements have abounded, but many institutions appear still not to know of them or the options available to them. Some of our specialized agencies have moved far ahead of others in effecting procedures for joint evaluations. I have just perused an agreement between four specialized agencies that is a model for such evaluations, defining the role of the institution, patterns for cooperation, forms of self-study reports possible, selection of evaluators, forms of evaluation reports, and action by various Commissions. This is but the latest in efforts of which you should be aware, some of which are outlined in COPA's publication on "A Guide to Interagency Cooperation" which should be in the hands of the chief executive officer and/or accreditation liaison officer in all of our institutions. There is still a long way to go, but much has been accomplished in a relatively short span of time.

III

Turn now to how the Council on Postsecondary Accreditation is addressing these mutual concerns.

First, it provides a national forum for communication among agencies on a regular basis about common problems, and issues, and sharing ideas and solutions for the improvement of the accrediting process. In the past year alone, Task Forces have brought together representatives of accrediting associations, institutional leaders, and the public, to explore issues of common concern. One of these is wrestling with the issue of disclosure and confidentiality, analyzing the entire range of documents generated in the accrediting process and elements defined or implicit in final accrediting actions, with a view of determining what may or ought to be disclosed to assure public accountability without violating the integrity of the process and frustrating the achievement of its purposes...Another is examining the possibility of providing institutions with the opportunity of evaluating the way in which accrediting associations on their campuses have demonstrated compliance with the provisions to which the agency has obligated itself for COPA recognition...A third task force is exploring the complex question of the validity and reliability of standards...A fourth is at work developing principles and policies for effective regulation of

off-campus educational activities offered regionally, inter-regionally, or abroad, and including education on military bases...In addition, a proposal for a project to be co-sponsored by COPA and NCHEMS, endorsed by the three COPA Assemblies, is now being considered by a major foundation. The proposal calls for the development of a common data base for the support of all institutional and programmatic self-studies and accreditation activities. I know of no step more major than this one in alleviating a major frustration of program and institutional heads, and enhancing other changes that can significantly improve the accreditation process.

Second, COPA encourages, as we have suggested, the cooperation and commitment of accrediting agencies, specialized and institutional, to cooperative arrangements for joint evaluations.

It further encourages the consolidation of independent program agencies into more comprehensive "umbrella" agencies cooperating with institutional agencies, like CAHEA, the National Council for Accreditation of Teacher Education, and the Accreditation Board for Engineering and Technology.

No less important, in a major reorganization effective last July 1, 1982, the COPA structure now includes as a full Assembly, joining the Assembly of Institutional Accrediting Bodies and the Assembly of Specialized Accrediting Bodies, the seven national postsecondary educational institution-based organizations, as full partners in the task of controlling proliferation, assuring that institutional needs are addressed in face-to-face discussion, and developing a more responsible and responsive system of self-regulation.

Another of COPA's major tasks is to work to dissuade any proposed federal and state statutory requirements of specified forms of accreditation as a basis for eligibility of funds or as a prerequisite to licensure, and to challenge such existing requirements.

Finally, in and through its recognition process, two significant changes have occurred. Far more emphasis is now given to agency standards emphasizing outcomes of study rather than the traditional process-oriented standards. The major study sponsored by COPA and funded by the Kellogg Foundation on "Evaluating Nontraditional Institutions" has already had impact on all agencies in forcing consideration of ways to measure results or outputs. Far more needs to be done in this direction, but this emphasis alone could clearly have major influence on agencies and institutions, and on the climate of confidence higher education seeks to restore.

The second change introduces new rigor and coherence to the recognition process. COPA has developed a new set of Provisions and Procedures, effective October 1, 1981, based on two paramount principles "(1) Accrediting structures and processes should not fragment the educational process but should contribute to the concept of education as an integration of disciplines into a meaningful whole; and (2) Duplication of accrediting activities in the same general area is to be avoided, since it invites inconsistent and contradictory actions and thus leads to confusion on the part of students, institutions, and the general public." Instead of accepting as an inevitable result of increasing specialization the proliferation of new accrediting agencies, a pre-applicant process is now required of any agency before it can make formal application to apply for initial recognition. That process is monitored by the Committee on Recognition,

and is an informal one, (and usually a long one) involving consultation, communication, negotiation, and feedback to enable the agency to focus on two major issues -- the need for the proposed accreditation, and the capacity of the agency to meet that need. Major attention is paid to the former, requiring investigation of all possible options. Can the need be met through existing agencies or in collaboration with other accrediting agencies? Is the need national, with a substantial universe of institutions or programs not presently being served and desiring accreditation? Clearly it is not necessary or desirable that every specialization be subject to all forms of quality assurance. Is licensure or certification sufficient in this area? Are there other ways besides accreditation for promoting and improving quality through existing associations that have professional programs, consultative services, and other activities for the improvement of members?

IV

Far more could be said, but let me now turn to the institutions themselves. I have already discussed their rights and you are fully aware of your concerns. But what about institutional responsibilities? Somehow over the years a strange attitude has developed about the accreditation process, that it is an external process to which institutions must submit. Not only prestigious institutions but most institutions look even on regional institutional accrediting agencies not as their self-regulatory instruments for quality assurance, but as "they". Perhaps it is a consequence of the fact that regional agencies, like all social mechanisms, once brought into being tend to develop a life of their own and thus become an "other". Perhaps it is an inevitable consequence of the dilemmatic roles those agencies and commissions have to accept of being both consultants to institutions to help them improve themselves and evaluators who have to render judgments about quality, and the latter role always risks being thought of as an adversary, not as a partner. Perhaps it lies in the uses to which self-regulatory processes have been put by federal and state governments and private foundations, so that access to funding becomes thought of as the only important part of the process, the real end of the ritual. Sheer ignorance, however, is a major cause, an unawareness on the part of most constituencies in our colleges and universities of our roots, of the self-imposed obligations we have assumed and the responsibility we have for ensuring that the instruments we have developed serve and promote the affirmation we have made that we have the right to regulate ourselves and will be responsible for proving to others that we can do so.

The specialized accrediting agencies, however unique in their ties to a profession or occupation, and however tied in with state licensing procedures, are still part of that same affirmation. Those ties or alliances may make it easier to think of them as external to us, imposing demands on us we resent, but they are part of the same whole, and their presumed externality cannot become an excuse for ignoring our institutional responsibilities. Let me cite some:

First, the major responsibility for program or institutional integrity and quality assurance rests with the individual programs, institutions, or governance systems in higher education. No conference, body, or accrediting agency can confer that. As Millard has said, "The primary commitment to educationally sound objectives and effective means of achieving them rests with faculties, administrators, trustees, students and alumni of programs, institutions, and systems. If the institutions and programs will not accept this

commitment and responsibility, no one can accept it for them."

Second, it is the institution's responsibility to determine those areas of specialized programming in which it believes it should seek accreditation. Accreditation is not the only indicator of educational quality. For educational activities where there is no compelling social need for licensure, certification or accreditation, there are other ways to promote and improve quality. There are wrong reasons for seeking accreditation for programs -- concern for prestige, the "Keeping-up-with-the-Joneses" syndrome, turf-imperatives, and others that have nothing to do with real need. Despite accreditation's long history in this country, seldom have I seen an institution with a broadly-based committee to study the appropriateness and desirability of specialized accreditation to meet the real program-needs of the institution.

Third, there is a corollary to this, representing an obligation all too rarely accepted -- that the institution has an obligation to determine whether it ought in fact to institute or to continue a particular program or programs. In a day when resources were seemingly unlimited, and, in the absence of any broadly-based committee to make appropriate decisions, all sorts of programs developed and sought accreditation. In a day when resources are seriously cut back, and when hard questions ought to be asked about what can and what cannot be done, not only are too many institutions not accepting the obligations to make tough judgments about programs that are marginal and yet must continue to be supported to assure any quality at all, but, in order to gain access to new student-resources, they are attempting program-development inconsistent with institutional mission and objectives and antithetic to any concern for program or institutional quality and integrity.

Fourth, we have said that an institution has the obligation to exercise its rights within the framework of a given set of reasonable standards. That clearly implies another responsibility. If standards are deemed to be unreasonable, the institution, school, or program should work through the accrediting association to modify those standards. Most associations are involved in a continuing process of review of policies, practices, and procedures, and welcome the suggestions that come from those concerned. Those who refuse to work for such changes--and there are unfortunately too many--~~but~~ express their resentments and frustrations to every other group and via every conceivable medium, not only weaken the ideal of voluntary self-regulation and its value, but contribute to the ambiguity. I have sometimes thought, as I have listened to individuals like this, that they must look on their relationship with the accrediting agency as Voltaire did with God. "We salute", he said, "but we do not speak".

A fifth imperative for all institutions is the obligation to be aware of the options now available for cooperative arrangements with accrediting agencies to reduce costs in money, energy and time, while maintaining the continuing self-study in which all institutions should be engaged. Many, perhaps most institutions, appear to be unaware of the options at all.

Finally, and more significantly, institutions have an obligation to develop their own planning and review schedule, so that self-study processes can be incorporated as an integral part of ongoing self-assessment. If that is not done--and it is all too rarely even thought of--it is small wonder that the accrediting visits are thought of as external, redundant, something that forces the institution to divert its energies and set aside its priorities for months

or a year. Here is where a broadly-based committee, with primary responsibility for coordinating the work of accrediting associations and fitting that work into the institution's own cycle, can be of significant help. It is astounding, but true, that many in our institutions do not know that accreditation takes place at the request of the institution through its president, and that request for coordinated, joint, or complementary accreditation activities must come from the institution itself.

* * * * *

The accreditation process is, as someone has well said, a very fragile process, but it is ours. As it now exists, it is far from the level of quality it must achieve, but it remains one of the grandest examples of cooperation devised by those who believe they can regulate themselves. We will, however, surely lose that right and power unless we consider its preservation, constant renewal and support among the highest of our priorities. The ideal will not make its own way. We cannot salute and not speak. Quality-controls and increased cooperative efforts to do the job better are not its business, because accreditation is not an it internal to you; it is you; it is all of us. Riding on the Washington subway the other day I saw a sign advertising I know not what. It said, "If not now, when? If not us, who?" Without the combined efforts of COPA, the accrediting agencies, and the institutions to address our mutual concerns and accept our specific responsibilities, the answer to that last question is certain--and frightening.

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